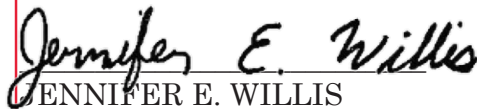


This request is GRANTED. Plaintiffs are also reminded that this Court requested an un-redacted copy of the third-party emails at issue in Dkt Nos. 168, 169. See Dkt. No. 188 at 102.

May 23, 2025

**BY ECF FILING**

Hon. Jennifer E. Willis  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007



JENNIFER E. WILLIS  
United States Magistrate Judge  
May 28, 2025

**Re: *Safo et al. v. Singh et al* (1:19-cv-03779-VSB-JW)**

Dear Judge Willis:

In accordance with Rule I(C) of Your Honor's Individual Rules & Practices in Civil Cases, the parties jointly come to the Court to request an adjournment of expert discovery as set out in the current Case Management Plan and Scheduling Order (ECF No. 154), which was ordered by the Court on December 23, 2024. Expert discovery is scheduled to close on May 23, 2025. However, there are six discovery-related motions currently pending before the Court concerning fact discovery. Plaintiffs prefer to complete all fact discovery before engaging in expert discovery. Defendants do not object and believe the most efficient and opportune time for expert discovery is after summary judgment. At this time, Plaintiffs are not prepared to agree to defer expert discovery until after summary judgment. Accordingly, the parties seek an adjournment of the current expert discovery deadline and propose to submit to the Court a revised schedule for expert discovery within seven days of the Court's order on the pending motions.

The parties have previously made numerous requests for extension of fact discovery, which in turn resulted in extension of expert discovery, but this is the parties' first request concerning specifically the schedule for expert discovery.

The parties thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jan Cervenka

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